

COVER SHEET FOR AMENDMENT OF POST-TRAVEL SUBMISSION

Date/Time Stamp
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PUBLIC RECORDS

2023 MAY 11 PM 1:58

Instructions: Use this form as a cover sheet for any paperwork you may need to submit to the **Office of Public Records** in order to make your Privately Sponsored Post-Travel Submission complete in accordance with Rule 35. **Only complete this form if you need to submit an amendment to a post-travel filing you have already submitted.**

SUBMIT DIRECTLY TO THE OFFICE OF PUBLIC RECORDS IN 232 HART BUILDING

Name of Traveler: Elizabeth MacDonough

Employing Office/Committee: Secretary of the Senate/Parliamentarian

Travel Expenses Paid by (List all sources): Renew Democracy Initiative

Travel Date(s): April 27-28 2023

Description/Title of Attached Forms: post travel form, invitation, itinerary Ethics Approval

Purpose of Amendment (describe the reason for amending original submission): Increase in travel and meal cost

5/10/23
(Date)

Elizabeth MacDonough
(Signature of Traveler)

RE-3 Senators and Officers Post Travel Disclosure of Travel Expenses

Date/Time Stamp

Post Travel Filing Instructions: Complete this form within **30 days** of returning from travel. Submit all forms to the Office of Public Records in 232 Hart Building. **This form is a public disclosure. The form and all attachments will be made publicly available.**

Certification: In compliance with the Regulations Governing Privately Sponsored Travel, Senate Rule 35, and the Honest Leadership and Open Government Act of 2007, I certify that I accepted the following gift of privately sponsored travel:

Private Sponsor(s):

Renew Democracy Initiative

Travel Dates:

04/27/2023-04/28/2023

Name of accompanying family member (if any):**Relationship to Traveler:**

Total Expenses

Transportation Expenses	Lodging Expenses	Meals Expenses	Other Expenses (Amount & Description)
543	369	155	

I also certify that attached to this form are all required documents for post travel disclosure, including:

- The final **Private Sponsor Travel Certification Form** with all attachments
- The final invitation
- The final approved itinerary

I certify that all trip information reflected in the attachments above accurately reflects the travel that I accepted. If there were any changes to the trip after I received approval from the Committee, the changes are described in ATTACHMENT 1.

I have made a determination that the expenses set out above in connections with travel described in the Employee Pre-Travel Authorization form, are necessary transportation, lodging, and related expenses as defined in Rule 35.

Date


Signature of Senator/Officer

ATTACHMENT 1 – CHANGES FROM APPROVED PRE-TRAVEL

Note: Material changes to a trip that occur after the Committee has issued an approval letter may invalidate the Committee's approval. Please contact the Committee with any questions regarding changes to an approved trip.

Were there any changes to the pre-approved travel expenses? (Transportation, Meals, Lodging, Other)?

☒ Yes ☐ No

Expense Change	Revised Amount	Explanation
meals	155	the cost of the dinner was not originally included price decrease
train	543	{ the train tickets were purchased later due and lodging to ethics approval 1 wk before
Lodging	369	

Were there any changes to the pre-approved itinerary?

☐ Yes ☒ No

Explanation:

Were there any additional changes to the pre-approved trip?

☐ Yes ☒ No

Explanation:

CHRISTOPHER A. COONS, DELAWARE, CHAIRMAN
JAMES LANKFORD, OKLAHOMA, VICE CHAIRMAN

BRIAN SCHATZ, HAWAII
JEANNE SHAHEEN, NEW HAMPSHIRE

JAMES E. RISCH, IDAHO
DEB FISCHER, NEBRASKA

SHANNON HAMILTON KOPPLIN, CHIEF COUNSEL AND STAFF DIRECTOR
WILLIAM B. CABLE, CHIEF CLERK

HART SENATE OFFICE BUILDING, ROOM 220
SECOND AND CONSTITUTION AVENUE, NE
WASHINGTON, DC 20510-6425

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TDD: (202) 226-3752

United States Senate

SELECT COMMITTEE ON ETHICS

April 21, 2023

Elizabeth MacDonough
Office of the Secretary of the Senate
United States Senate
Washington, DC 20510

Dear Ms. MacDonough:

This responds to your recent correspondence requesting approval from the Select Committee on Ethics (the Committee) to accept an invitation you received to travel to the 2023 Heroes of Democracy Awards Gala, on April 27–28, 2023, sponsored by the Renew Democracy Initiative (RDI). Provided that you adhere to the guidance set forth below, it appears that it is permissible for you to accept necessary expenses from RDI in connection with this trip.

Background

Based on your communication with the Committee, the background in this matter is as follows.¹ You are employed as the Parliamentarian for the Office of the Secretary of the Senate, and Secretary Sonceria Ann Berry is your supervising officer. RDI invited you to travel to the 2023 Heroes of Democracy Awards Gala in New York, New York, on April 27–28, 2023. RDI certified to the Committee that it will pay the necessary expenses² related to the travel and that it is neither a lobbyist, lobbying firm, agent of a foreign principal, or otherwise acting as a representative or agent of a foreign government. RDI has also certified that it does not retain or employ a registered lobbyist or agent of a foreign principal and that no registered lobbyist or agent of a foreign principal will accompany you at any point throughout your trip.³

Discussion

Privately sponsored travel includes any gift of travel and travel-related expenses for travel outside the Senate duty station, including transportation, lodging, food and refreshments, and conference fees and materials, whether paid for directly, reimbursed, or provided directly, from a private individual or entity, in connection with a Member's, officer's, or employee's official Senate duties. Incorporating reforms from the Honest Leadership and Open Government Act of 2007 (HLOGA), Pub. L. 110–81 (2007), Senate Rule 35.2 permits Members, officers, and employees to accept privately sponsored travel only with the prior written approval of the Committee.

¹ If this letter does not correctly recite the facts, contact the Committee immediately.

² The term "necessary expenses" has a specific definition. See *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel* at 10-13.

³ The term "any point throughout your trip" has a specific definition. See *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel* at 15.

The Committee's approval process is governed by the *Regulations and Guidelines for Privately Sponsored Travel (Travel Regulations)*. The *Travel Regulations* contain detailed requirements regarding who may sponsor travel; time limits for trips; and the type and amount of expenses that can be reimbursed.

Entities that do not retain or employ a lobbyist or foreign agent and all non-profit organizations designated as tax-exempt organizations under § 501(c)(3) of the Internal Revenue Code of 1986, regardless of whether they retain or employ a lobbyist or foreign agent, may sponsor domestic trips for up to three days. The three-day limitation means three 24-hour periods, calculated from the time of arrival in the trip location to the time of departure from the trip location. For such trips, neither lobbyists nor foreign agents may accompany a Senate invitee at any point throughout the trip, other than in a *de minimis* way.⁴ This means that neither lobbyists nor foreign agents may accompany Senate invitees at any point to and from the event, at the event itself, or at the location being visited.⁵

Under Senate Rule 35, Senate staff must receive advance authorization signed by the Member or officer under whose direct supervision the individual works in order to accept payment or reimbursement for necessary expenses related to fact-finding travel. Further, such authorization and expenses must be disclosed to the Secretary of the Senate by filing the completed *Employee Pre-Travel Authorization* and the *Employee Post-Travel Disclosure of Travel Expenses* (Form RE-1 and Form RE-2), along with a copy of the *Private Sponsor Travel Certification Form*, and all relevant attachments (e.g., the private sponsor's invitation and itinerary) **within 30 days of the conclusion of Privately Sponsored Travel**.

Consistent with these standards, Committee precedent, and RDI's factual representations, it appears that it is permissible for you to accept necessary expenses from RDI in connection with this trip, provided that the actual travel and travel-related expenses conform to the information and materials you provided, and the travel and all required documents are disclosed to the Secretary of the Senate (Office of Public Records).

⁴ The term "*de minimis*" has a specific definition. See *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel* at 6-8.

⁵ See *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel* at 6-10.

Finally, Senate Rule 34 requires a reporting individual,⁶ on their financial disclosure report, to make an annual disclosure of the receipt of payments or reimbursements under Senate Rule 35 from a private sponsor for officially-related travel expenses where, in the aggregate, travel expenses exceed \$480 from that sponsor during a calendar year. However, if a Member, officer, or employee properly reports the receipt of necessary expenses for such travel to the Secretary of the Senate within 30 days of the travel, as discussed above, the travel expenses need not be disclosed a second time on their financial disclosure report.

I hope you find this information helpful. If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,



Shannon Hamilton Kopplin
Chief Counsel and Staff Director

Enclosure: Employee Privately Sponsored Travel Checklist

⁶ A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 (\$141,022 for CY 2023) or is a political fund designee and is required to file financial disclosure reports.

MacDonough, Elizabeth (Secretary)

From: Uriel Epshtein <u.epshtein@rdi.org>
Sent: Sunday, April 23, 2023 1:15 PM
To: Heroes of Democracy Gala (RDI)
Cc: Caitlin Forrest
Subject: IMPORTANT: RDI Gala Information - April 27th
Attachments: Detailed Invite - Heroes of Democracy Gala (1).pdf

Hi All,

I hope everyone is having a great weekend. I'm reaching out with additional details regarding RDI's *Heroes of Democracy* gala at the Yale Club in NYC this coming Thursday, April 27th. If you have anybody you'd like to invite last-second whom you haven't already reached out to us about, please let me know ASAP. We'd love to welcome them.

Address: Yale Club NYC - 50 Vanderbilt Avenue, New York, NY 10017

Arrival Time: Please arrive no later than **5:45 pm** so that we have time for Board, Honoree, & Affiliate photos.

Dress code: Cocktail Attire

If you have any other questions, please reach out to me and sponsorships@rdi.org, which is in the "to" field here.

Thanks very much and I look forward to seeing you soon!

Best,
Uriel

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Uriel Epshtein
Executive Director - Renew Democracy Initiative
www.rdi.org
202-760-0286

Heroes of Democracy

Awards Gala

Thursday
April 27th, 2023

VIP Fireside Chat 6:00 PM

Cocktails 6:30 PM

Dinner 7:30 PM

RDI's Heroes of Democracy Awards Gala celebrates those who have fought for freedom at great personal risk.

RSVP at
sponsorships@rdi.org

The Yale Club

**50 Vanderbilt Avenue,
New York, NY 10017.**

Founded in 2017 by Russian dissident and former world chess champion Garry Kasparov, the Renew Democracy Initiative (RDI) identifies and combats threats to freedom in the US and around the world. Today, RDI is one of the leading organizations supporting Ukraine's efforts to defend its democracy from Russia's invasion.

On April 27th, 2023, RDI will host its first Heroes of Democracy Awards Gala at the Yale Club in New York City, convening leaders in the global pro-democracy movement. During the Gala, RDI will be honoring the **Ukrainian Foreign Minister Dmytro Kuleba**, fighting for his nation's survival; **Carine Kanimba**, the daughter of *Hotel Rwanda* Hero **Paul Rusesabagina**, who bravely fought for her father's freedom; **US Senate Parliamentarian Elizabeth MacDonough and her colleagues**, unsung heroes who have protected America's democratic processes, and **Philanthropist Howard Buffett**, a key investor and believer in Ukraine's recovery.

In addition to our honorees, the Renew Democracy Initiative's Board of Directors and wider network will be in attendance including Garry Kasparov, Senators Heidi Heitkamp and Bob Kerrey, General McChrystal, LTC Alex Vindman, and many others.

RDI has established an international network of more than 100 political dissidents from nearly 40 oppressive countries as part of its Frontlines of Freedom program. This network exposes how authoritarianism operates and reminds Americans how inspirational their own freedom truly is. Supporting RDI through the Gala is an opportunity for you to take direct action in defense of democracy.

We ask that you consider becoming a sponsor. Sponsors will be included in promotional materials and invited to a private VIP fireside chat with RDI's founder Garry Kasparov preceding the evening Gala. The proceeds from this event will fund the Frontlines of Freedom program as well as RDI efforts to support Ukraine and combat authoritarianism.

For questions please email **sponsorships@rdi.org**

RDI Renew
Democracy
Initiative

Trip Name: Renew Democracy Awards Dinner

Organization Information

Organization Name:

Renew Democracy Initiative, Inc.

Is your organization classified as a §501(c)(3)?



Yes



No

If Yes, §501(c)(3) Organization Type:



Private Foundation



Public Charity

Address:

1230 Avenue of the Americas

City, State, Zip:

New York NY 10020

Phone Number:

2027600286

Organization URL:

www.rdi.org

History of Congressional Travel

Describe your organization's history of sponsoring congressional travel.

There has been no prior sponsored congressional travel

Educational Activities

Describe the educational activities performed by your organization other than sponsoring congressional travel.

RDI hosts events featuring dissidents who have risked their lives for some semblance of freedom in their home countries at university campuses and other venues. RDI also creates a variety of different content promoting democratic principles.

Lobbyist and Foreign Agent Registration Information

Lobbyist Registration Status (Select one):



I certify that the sponsor is not a federally registered lobbyist and does not retain or employ a federally registered lobbyist.



I certify that the sponsor is not a federally registered lobbyist but does retain or employ one or more federally registered lobbyists.

Foreign Agent Registration Status (Select one):



I certify that the sponsor is not an agent of a foreign principal and does not retain or employ an agent of a foreign principal.



I certify that the sponsor is not an agent of a foreign principal but does retain or employ one or more agents of a foreign principal.

Foreign Government Involvement

Foreign Agent Registration Status (Must select all):



I certify that the sponsor is not a foreign government.



I certify that the sponsor is not an entity that is owned or operated by a foreign government.



I certify that the sponsor does not receive funding from a foreign government.

Purpose and Details

Provide a brief description of the trip.

We have invited Elizabeth Coss MacDonough to attend and be an awardee at our annual Heros of Democracy Gala. We have also invited Christina Anna Amatos and Leigh Gipson Hildebrand from the office of the Senate Parliamentarian

Explain how the purpose of the trip relates to your organization's mission.

The purpose of the Dinner is to highlight those who have made significant contributions to defending democracy .

Is your organization the only sponsor for this trip?

☒ Yes ☐ No

If No, describe your organization's role in planning the trip.

If there are multiple sponsors, each sponsor must submit Organization Information (Page 1 of the Private Sponsor Travel Certification Form) and a Signature Page Form.

Grantmaking Organizations (Optional)

If you have a Grantmaking Organization, you must attach a Grantmaking Organization Certification Form.

- 1.
- 2.
- 3.

With or Without Regard to Congressional Participation (Select one):

- ☒ The trip is arranged or organized without regard to congressional participation.
- ☐ The trip is arranged or organized with regard to congressional participation.

Lobbyist/Foreign Agent Involvement in Planning, Organizing, Requesting or Arranging

- ☒ The trip will not in any part be planned, organized, requested, or arranged by a registered lobbyist or agent of a foreign principal, other than de minimis involvement.

Lobbyist/Foreign Agent Financing (Must select all):

- ☒ The trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.
- ☐ No funds or in-kind contributions were earmarked directly or indirectly for the purpose of financing this specific trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal.

Lobbyist/Foreign Agent Accompaniment

Complete if all sponsors are §501(c)(3) organizations (Select one):

- ☐ The trip is limited to three days (for trips inside the continental United States) or seven days (for trips outside the continental United States), and no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee at any point throughout the trip
- ☒ The trip is limited to a one-day event (exclusive of travel time and one overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee on any segment of the trip
- ☐ The trip is limited to a one-day event (exclusive of travel time and two overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee on any segment of the trip

Complete if any of the sponsors is not a §501(c)(3) organizations (Select one):

- ☐ The trip is limited to three days (for trips inside the continental United States) or seven days (for trips outside the continental United States), and no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee at any point throughout the trip
- ☐ The trip is limited to a one-day event (exclusive of travel time and one overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee on any segment of the trip
- ☐ The trip is limited to a one-day event (exclusive of travel time and two overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee on any segment of the trip

Certification of No Recreational Activity and No Alcohol (Must select all):

- ☒ Travel expenses paid for will not include expenditures for recreational activities.
- ☒ Travel expenses paid for will not include expenditures for alcohol, except as permitted by the Regulations Governing Privately Sponsored Travel.

Will members and staff from the House of Representatives receive invitations?

- ☒ Yes ☐ No

Travel Details (Submit additional pages as needed)

Trip Start Date/Time:

4/27/2023



Trip End Date/Time:

4/28/2023

Will the traveler be accompanied by a family member for whom the sponsor will pay travel expenses?

☐ Yes

☒ No

Transportation (Member/Officer/Employee: \$⁵⁰⁵ Accompanying Family Member: \$⁰)

Transportation Type	Class	Amount
Amtrak for 3 persons	Acela Business	\$1515.00

Details (optional)

Lodging (Member/Officer/Employee: \$²⁷⁵ Accompanying Family Member: \$⁰)

Check-In	Check-Out	Facility	City	State	Country
4/27/23	4/28/23	Yale Club	NewYork	NY	USA

Nights	Cost/Night	Cost Exceed Per Diem (Yes/No)
1	275 per r	

If Yes, please explain why expenses over the per diem rate are reasonable and necessary.

Check-In	Check-Out	Facility	City	State	Country

Nights	Cost/Night	Cost Exceed Per Diem (Yes/No)

If Yes, please explain why expenses over the per diem rate are reasonable and necessary.

Check-In	Check-Out	Facility	City	State	Country

Nights	Cost/Night	Cost Exceed Per Diem (Yes/No)

If Yes, please explain why expenses over the per diem rate are reasonable and necessary.

Meals (Member/Officer/Employee: \$¹⁸⁹ Accompanying Family Member: \$⁰)

Date	Breakfast	Lunch	Dinner	Incidentals	Total	City	State	Country	Cost Exceeds Per Diem (Y/N)
4/27/23			189		567	New York	NY	USA	

If costs exceed the federal per diem, please explain why expenses over the per diem rate are reasonable and necessary.

Reasonable Miscellaneous Expenses

(Member/Officer/Employee: \$ Accompanying Family Member: \$⁰)

Expense Type	Amount	Notes
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Additional Details (optional)

PRIVATELY SPONSORED TRAVEL

SPONSOR SIGNATURE PAGE

I hereby certify that the information submitted in connection with the trip listed below is true, complete, and correct to the best of my knowledge and belief.

Trip Name: Heros of Democracy Gala Dinner
Travel Date(s): 4/27/23-4/28/23
Travel Destination(s): New York City

Sponsor: Renew Democracy Initiative Inc.

Uriel Epshtein
(printed name of sponsor representative)

Executive Director
(title)


(signature of sponsor representative)

3/28/23
(date)